



DATE: February 16, 1988
TO: Division File, Bob Wengrow, Tom Henninger
FROM: Bob Carson *RAC*
SUBJECT: 2010300032 -- Winnebago County
Rockford/Rockford Products Plant #2
ILD 000805895
Part A Log A033 (11/4/85) Received 3/24/86
RCRA - Permit

EPA Region 5 Records Ctr.



393430

Introduction

This facility originally submitted their Part A withdrawal request to USEPA. This request was sent to IEPA after the Agency received final RCRA authorization. This reviewer received this Part A request approximately 12/1/87 along with the facility's certification for closure of a container storage area.

Review of the Part A withdrawal request and a review of the facility's file has shown that there are a number of data gaps and a considerable amount of ambiguity. Final resolution of the facility's Part A will require additional information from Rockford Products.

Discussion of HWMU's On Part A

According to Rockford Product's Part A application, the following units are present:

- Container Storage - S01 1,000 gal.
- Tank Storage - S02 1,000 gal.
- Tank Storage - S02 6,000 gal.
- Tank Treatment - T01 11,380 gpd
- Other Treatment - T04 122,400 gpd
- Other Treatment - T04 24,000 gpd

S01. From a review of the F.O.S. file, it appears that Rockford Products has two container storage areas. One unit consists of a 3 cubic yard dumpster which receives wastewater treatment sludge (F007, D006) from the filter press. This unit is apparently located at the wastewater treatment plant. During one inspection, spillage was observed at this unit because the dumpster was not properly located beneath the conveyor from the filter press. This waste was reportedly being removed to BFI's Winthrop Harbor landfill.

Another indoor container (drum) storage area is present on the west side of the plant. This unit is being closed under Closure Log C-117.

S02. There are two storage tank locations identified on the Part A application. One of them reportedly has 1,000 gallons of capacity and the other holds 6,000 gallons.



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The north tank(s) is(are) underground and may actually consist of four 1,000 gallon tanks (per Tom McNamee telecon 12/11/87). According to Tom, these tanks contained quench oil (product) and may be abandoned. I mentioned to Tom that the State Fire Marshall regulations now prohibit in-place abandonment of underground tanks which have contained flammable liquids. Although not discussed during this telecon, these tanks must also be registered with the Office of the State Fire Marshall. The Agency's LUST file contains a letter from Charlie Zeal reminding them of their obligation to register their underground tanks. No record of a response from Rockford Products was contained in the file, however.

The west tanks have contained some type of oil. Spillage from this area contaminated the container storage area which was being closed and necessitated additional decontamination and recertification of closure. The containment pit for this tank storage area was to be decontaminated in accordance with cleanup criteria from COT. Pat Luedtke prepared a memo on August 4, 1986 which was to be sent to COT. This memo was found by this permit reviewer in the F.O.S. File on 2/5/88. It is unlikely that COT would have acted on this request even if it had received it because the information was not summarized and did not include all of the information which they require. I discussed this issue with Tom Henninger on 2/5/88 and was informed that he would talk to Bob Wengrow and let me know the following week as to how they want to proceed. I told Tom that this would not interfere with the closure certification.

Although the closure certification can be approved by the Agency before this cleanup has been completed, there is a problem with approving the withdrawal of their Part A. The F.O.S. memo regarding the Part A withdrawal application stated that the Part A should not be withdrawn until the soil contamination has been corrected. This seems to be appropriate, because the Agency will have limited influence with RP following withdrawal of the Part A and the soil is significantly contaminated. In addition to soil cleanup, more detailed information is needed regarding the types of tanks involved, number of tanks, capacity of each tank, products stored, current status, etc.

T01. Although no detailed information was available on this unit(s), it is apparent that it is part of the wastewater treatment plant and would be exempt from RCRA regulation. More detailed information should be obtained on the type of equipment involved, however.

T04. There were two T04 units listed on the Part A. Both of them are part of the wastewater treatment plant and are apparently covered by a permit from IEPA's Division of Water Pollution Control. The Part A application describes these units as follows:

Type 820/5100 chrome single stage finalizer to reduce hexavalent chromium to trivalent chromium (5100 gph = 122,400 gpd).

Pfaunder unit - closed loop, high vacuum, low temperature evaporator for plating rinsewater. The condensate is returned to the rinse tank and the concentrate goes back to the plating bath (1,000 gph = 24,000 gpd).



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Conclusion. This Part A withdrawal request is not approvable at this time. Additional information is needed about the units involved and soil cleanup must be completed at the one tank storage location. A denial letter should be prepared which identifies the data gaps and the response needed from Rockford Products.

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